I agree with the petitioner. I myself could never get to 13 wpm but once having achieved 5 wpm never really lost it, in spite of letting it go for years at a time. I never really thought about the petitioner's point #7 until I became a volunteer examiner and was told by someone with mild dyslexia of his incredible struggle to deal with code. By his account (and I realize this IS second hand) the "dits" and "dahs" would get de-sequenced in his mind as surely as printed letters on a page and he required months and months of training with special mnemonics tools. Suffice it to say that in my time as a volunteer examiner, I saw no applicant pass the fill in the blank morse test who had not already passed (by far) the 25 "letter" test, and that this particular [dyslexic] applicant was the only one I recall who had already passed his Extra theory prior to passing the code test. In fact, his element 4 CSCE was as I recall about 5 or 6 months old.